

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01963
(MEF-MAH)

**DECLARATION OF LIZA WEISBERG
IN SUPPORT OF PETITIONER'S MOTION TO SEAL**

Liza Weisberg, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a Senior Staff Attorney at the American Civil Liberties Union of New Jersey Foundation. I am admitted to practice law and a member in good standing in the State of New Jersey and of the bar of this Court. I am one of the attorneys representing Petitioner Mahmoud Khalil in this action.

2. I respectfully submit this Declaration in support of Petitioner's motion to seal the materials at ECF 281 in this action.

3. I have personal knowledge of the facts set forth herein or believe such facts to be true based upon information provided by knowledgeable persons.

4. In support of the Motion to Seal and in accordance with Local Civil Rule 5.3(c)(3), counsel for Petitioner has prepared the accompanying index identifying the redacted information Petitioner seeks to seal and describing with particularity: (a) the nature of the material; (b) the legitimate private or public interest which warrants the relief sought; (c) the clearly defined and serious injury that would result if the relief sought is not granted; (d) why a less restrictive alternative to the relief sought is not available; (e) any prior order sealing the same materials in the pending action; and (f) the identity of any party or nonparty known to be objecting to the sealing request.

5. Petitioner respectfully requests that the Court enter an Order sealing the unredacted version of the Declaration of Veronica Salama and exhibits attached thereto (ECF 281), filed on June 4, 2025.

6. A publicly available version of the Declaration and exhibits was filed on June 5, 2025, less than twenty-four hours after the unredacted version filed under seal. *See* ECF 284.

7. The text redacted from the publicly available version of the Declaration and exhibits contains personal identifying information of the Petitioner, including his A-number, and personal identifying information of non-parties, as well as sensitive medical information. The proposed redactions reflect the least restrictive option for avoiding harm to the safety and privacy of Petitioner and the relevant non-parties.

8. There is no prior order sealing the same materials in the pending action.

9. The materials Petitioner seeks to seal will aid the Court's consideration of his Petition.

10. Petitioner therefore respectfully requests that the Court enter an Order pursuant to Local Civil Rule 5.3(c) sealing the unredacted version of the Declaration of Veronica Salama and exhibits at ECF 281.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 9, 2025

By: /s/ Liza Weisberg
Liza Weisberg